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ABSTRACT

Information is presented for the vocational educator who wants to know about the opportunities and incentives for establishing closer ties between local vocational education systems and activities authorized by the Comprehensive Employment and Training Act (CETA). The first of three sections describes the philosophical and organizational differences between vocational education and CETA. Section 2 defines each of the eight titles included in the CETA amendments. In addition, possible linkages under CETA and vocational education legislation are explored. A final section explores strategies that can be used to overcome philosophical and structural differences in the two systems. Appended is a list of information sources on CETA. (LRA)

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Critical
Issues
Series, no. 3

A VOCATIONAL EDUCATOR'S GUIDE TO THE CETA SYSTEM

Jim W. Atteberry
David W. Stevens

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INTRODUCTION

Vocational educators can make major contributions to Comprehensive Employment and Training Act (CETA) clients through a variety of programs. There are financial incentives to encourage such cooperative efforts, as well as the chance to increase the importance of vocational education in a community.

Vocational education involvement in CETA can include classroom training, on-the-job training and a variety of services, ranging from determining the appropriate employment and training activity for an applicant to providing post-termination services for clients who have moved on to unsubsidized jobs.

Opportunities for CETA-vocational education linkages may involve orientation to the world of work, counseling, employability assessment, job development and vocational exploration activities.

This publication is written for the vocational educator who wants to know about the opportunities and incentives for establishing closer ties between local voc ed systems and activities authorized by CETA.

There are barriers to cooperative efforts that must be explored from the perspective of the vocational educator. These include the philosophical and structural differences between the education and CETA systems, as well as the question of the adequacy of incentives and the problem of resistance to change.

The underlying premise in discussing these barriers is that there has not been enough attention at the national level to the potential for CETA-vocational education linkages. There is, however, much that you can do at the local level to initiate cooperative efforts. This book is designed to help you make the most of your opportunities.

Part I
DIFFERENCES BETWEEN VOCATIONAL EDUCATION AND CETA

CETA and vocational education constitute two very different systems for improving employment prospects for their clients. These differences are rooted in two contrasting philosophies about training and education. The effects of these differences are far-reaching—they are reflected in approaches to the target groups served, the time frame for training, the nature of services to be offered and the amount of funds provided by the federal government.

PHILOSOPHICAL DIFFERENCES

CETA is designed to provide job training and employment opportunities for the economically disadvantaged, unemployed and underemployed. The explicit goal of this training is to increase the income earned by clients. Typically, the time frame for accomplishing this objective is relatively short and the nature of services offered is varied. CETA regulations authorize support services like health care, child care and transportation to enable persons to participate in employment and training programs.

Unlike CETA's focus on economic disadvantage, the focus of vocational education programs is educational disadvantage. The intent of voc ed programs is less specific than that of CETA. Title II, Vocational Education, of the Education Amendments of 1976 authorizes federal grants to states to help them provide vocational education ". . . so that persons of all ages in all communities of the state . . . will have ready access to vocational training or retraining which is of high quality (and) which is realistic in light of actual or anticipated opportunities for gainful employment . . ."

Presumably then, the federal focus is on making vocational education accessible to those who need or want the service. Little direction is given in the legislation to the specific economic or educational effects that such programs are to have on the individuals served. Traditionally, the emphasis of vocational education has been on skill training. CETA, on the other hand, may incorporate skill training as part of a comprehensive approach to solving a client's employment-related problems.

ORGANIZATIONAL DIFFERENCES

Organizational structure reveals the roles that various agencies are expected to play in accomplishing the goals of a system. Understanding these roles helps one to better understand a delivery system and to identify basic differences when comparing one system to another. Differences in organizational structures between vocational education and CETA should be recognized, since they have the potential to serve as barriers to coordination.

The CETA Structure

The CETA system is fundamentally a decentralized approach to employment and training. It is designed to stress local decision-making by locally elected officials. There are two primary players in the CETA delivery structure: *the federal government,* which provides the resources, and units of local government called *prime sponsors,* which administer and often operate the programs at the local level.

Although decisions about whom to serve, what programs to provide and who is to provide the service are made by prime sponsors, the federal government (Congress and the Department of Labor) exercises control and influence. This is achieved through the legislative process, authorization and appropriation of funds and implementation of administrative rules and regulations.

In fact, the broad parameters that establish the program emphasis (target groups, eligibility requirements and evaluation and monitoring procedures) are established in federal legislation and set in motion by the Department of Labor through the administration of the rules and regulations. It is important always to keep in mind the nature of the federal-local relationship within CETA and the fact that the federal level can exert influence to promote coordination with vocational education.

Under the CETA structure, the state government's role has been minimized. With the important exceptions of state employment and training councils (SETCs), the governor's special grant money and balance of state prime sponsorship, state governments are not actively involved in the delivery of CETA programs. This poses a major problem for state education agencies since they cannot initiate coordination with a comparable agency overlooking CETA programs statewide.

The Vocational Education Structure

The CETA organizational structure may seem simple in comparison to vocational education since voc ed is not a single unified system. Instead, vocational education has a dual federal-state and state-local system.

Beginning with the Smith-Hughes legislation in 1917 and continuing through the 1976 Education Amendments, Congress has provided funds to support vocational education through a matching fund provision. These funds have helped establish what may be called a partnership between federal and state government to provide for the support of vocational education (*What is the Role of Federal Assistance for Vocational Education?*, 1974, p. 2-3).

The initial matching fund requirement was necessary to establish vocational education. Without it states probably would not have provided vocational training. Today, however, the states' role in providing funds for vocational education has greatly expanded. According to the National Center for Education Statistics, the federal government provided 8.9 percent of the money spent on vocational education in fiscal year 1979. State and local government provided the rest.

Over time, states have become less dependent upon the federal funds, and, as a result, have established their own state-local systems. In effect, there are two somewhat autonomous federal-state and state-local systems of vocational education.

The basis of the federal-state system is federal legislation, which authorizes the financial support for the system and defines the boundaries, goals and objectives for it. During the 1970s, the basic character of most federal assistance programs in education has changed from helping state or

local governments accomplish their objectives to using state departments of education as administrative conveniences with explicit controls for accomplishing specific federal objectives (Milstein, 1976, p. 5-13).

This policy shift has reinforced the creation of a dual system in which the state-local systems of vocational education pursue goals and objectives that may conflict with federal goals.

Differences in philosophy and organizational structure have two important implications for your efforts to collaborate with prime sponsors. First, you must be prepared to accept the goals of CETA programs as your own. Next, you must recognize that CETA has been mandated to serve specific client groups—the economically disadvantaged, unemployed and underemployed. Vocational education, on the other hand, is designed to be accessible to the general population, with set-asides for designated client groups.

CETA's Major Provisions

CETA has evolved as follows:

The Comprehensive Employment and Training Act of 1973. Created a more decentralized delivery system with fewer eligibility categories than had existed under the Manpower Development and Training Act (MDTA) of 1962. It substantially increased funding levels.

The Youth Employment and Demonstration Projects Act (YEDPA) of 1977. Established employment and training programs designed to demonstrate the effectiveness of various techniques for reducing youth unemployment. Incorporated as Title IV: Part A of the CETA Amendments of 1978.

The CETA Amendments of 1978. Sharpened the distinction between funds devoted to provide earning opportunities for those temporarily out of work due to poor economic conditions and funds designated to help those who require more substantial development of work skills.

Title IV: Part A of the CETA Amendments of 1978 created:

- Youth Employment and Training Program (YETP)
- The Young Adult Conservation Corps (YACC)
- The Youth Community Conservation and Improvement Projects (YCCIP)
- The Youth Incentive Entitlement Pilot Projects (YIEPP)

Since both the Vocational Education Act and CETA must be reauthorized in 1982, local vocational educators should determine what is their proper role in the federal effort to develop the individual earning capacities and employment goals of CETA clients.

References

General Accounting Office. *What is the Role of Federal Assistance for Vocational Education?* Washington, D.C.: Author, 1974.

Milstein, M. M. *Impact and Response: Federal Aid and State Education Agencies.* New York: Teachers College, Columbia University, 1976.

A 26-week course at Southern Maine Vocational Technical Institute prepares this student for employment as a machinist. CETA funding provided support for the machine tool operators course at the school. *(Photo courtesy of Southern Maine Vocational-Technical Institute.)*

Part II
UNDERSTANDING THE CETA AMENDMENTS

The CETA Amendments of 1978 consist of eight titles, each providing important opportunities and incentives for vocational educators.

These titles are:

Title I: Administrative Provisions
Title II: Comprehensive Employment and Training Services (for the structurally unemployed)
Title III: Special Federal Responsibilities
Title IV: Youth Programs
Title V: National Commission for Employment Policy
Title VI: Countercyclical Public Service Employment Program
Title VII: Private Sector Opportunities for the Economically Disadvantaged
Title VIII: Young Adult Conservation Corps

Before discussing each title of the act, the following terms must be defined:

Prime sponsor: May be a state, a unit of general local government that has a population of 100,000 or more; a consortium of units of general local government that includes at least one unit qualifying on its own merits, and several other special designees (for example, existing Concentrated Employment Programs)

Balance of state (BOS): All areas within a state that are not within the jurisdiction of local prime sponsors; areas served by the state acting as a single prime sponsor

Program agent: A unit of general local government, or combination of such units, with a population of at least 50,000 within the jurisdiction of a single prime sponsor, which has the legal authority and administrative capability to operate an employment and training program.

Recipient: A unit of government or an organization that receives CETA funds directly from the Department of Labor through a grant to perform substantive services

Subrecipient: Any person, organization or other entity that receives CETA funds through a recipient to perform substantive services

The definitions of these terms are important to assist you in determining which prime sponsor designation applies for your area. You will need to find out what program agents, recipients and subrecipients already exist. This information should be determined before you invest time developing a specific agenda for cooperative involvement in your community.

TITLE I: ADMINISTRATIVE PROVISIONS

This title describes the planning process prime sponsors are required to follow, establishes mandated advisory council memberships and lists the type of client services for which CETA funds may be spent.

Each prime sponsor must submit a Comprehensive Employment and Training Plan (CETP) to apply for financial assistance under CETA auspices. The CETP consists of a long-term agreement called a *Master*

Plan, which describes administrative and programmatic arrangements that will apply. It also features an *Annual Plan,* which sets forth the yearly agenda of activities and services that will be offered to eligible applicants.

Prime sponsors are required to involve a broad spectrum of community representatives, including vocational educators, in the development of the CETP. (Section 103 of the Act and Sections 676.6-696.16 of the regulations describe the planning and approval processes.) The CETP must include a detailed description of:

- The methods and organizational arrangements that will be adopted to involve educational agencies
- The methods and criteria that will be used to select who will deliver services from the pool of qualified organizations
- Procedures for educational agencies to participate in the planning process
- Provisions for utilizing the services and facilities that already are available, including skill centers and other public and private vocational education facilities
- The procedures for awarding trainees academic credit, as developed in conjunction with appropriate local education agencies.

Local Participation in Planning

By law, representatives from local vocational education agencies must be members of the prime sponsor planning council (Section 109 of the act). The council is to gather and provide information about available resources of vocational education institutions in the area. Vocational educators who already have established ties with other community organizations should bring this network to the attention of the local prime sponsor.

The planning council also considers comments and recommendations made by the prime sponsor's private industry council (PIC) and youth council. (The memberships and activities of these important councils are described under Titles VII and IV, respectively.)

With balance of state prime sponsors, regional manpower advisory committees serve this advisory role. Nominations for membership on either type of advisory body require awareness by local elected officials of your interest and qualifications to serve.

In addition to the work of advisory councils, you should also become aware of other agencies that deliver services in your area. Prime sponsors are required to maintain a public roster or inventory of potential qualified service deliverers. A request to be included on such a list, including a statement of organizational qualifications, should be made in writing to the prime sponsor director.

You should consult this list periodically to determine which organizations in your community offer competitive services. You also might want to note the organizations listed on the roster that could offer complementary resources for joint ventures. Be aware that in selecting service deliverers, prime sponsors are required to give special consideration to community based organizations (CBOs) that operate employment and training programs of demonstrated effectiveness. CBOs are private, nonprofit

organizations that are representative of communities or significant segments of communities.

A prime sponsor that fails to select a CBO of demonstrated effectiveness as a subrecipient must, if asked, provide reasons for not doing so and relate these to the stated selection criteria outlined in the CETP. It would be well worthwhile for you to find out what the criteria are. After all, you have an important role to play in assuring that duplicated service is avoided whenever possible.

Prime sponsors are required to consult with the appropriate apprenticeship agency concerning any training activities in occupations for which an apprenticeship is required. Such training must be designed in conjunction with an appropriate registered apprenticeship program. This stipulation provides an opportunity for you to become involved in CETA funding of the apprenticeship occupations through any pre-existing relationships you might have with union officials and Bureau of Apprenticeship and Training representatives.

State-Level Representation

In addition to these provisions for each prime sponsor, any state seeking CETA funds is required to prepare a Governor's Coordination and Special Services Plan. This plan is designed to coordinate all employment and training, education and related services provided by the state, by prime sponsors, by state education agencies and other appropriate institutions of vocational and higher education.

This coordinating function is typically carried out by the state employment and training council (SETC), previously known as the state manpower services council. The SETC includes at least one representative each from the State Board for Vocational Education and the state advisory council on vocational education. It is charged with identifying, in conjunction with the state advisory council on vocational education, the employment and training and vocational education needs of persons in the state. It must assess the extent to which employment and training, vocational education and other programs assisted under this and related acts represent a consistent, coordinated approach to meeting such needs.

The SETC must comment at least once annually on the reports of the state advisory council on vocational education. It must review the comprehensive employment and training plans of prime sponsors with an eye toward those services that are not being utilized or those that are being duplicated.

It is apparent that sufficient enabling language exists in Title I and related regulations to make it possible for you to get involved in the CETA planning process. Taking advantage of this opportunity requires establishing personal contact with the prime sponsor, local CBOs, local offices of the State Employment Security Agency (SESA) and local labor officials. Your contact with these groups will enable you to determine what organizational capabilities and relationships already exist.

A good way to begin this familiarization process is to secure from the

prime sponsor a copy of the most recent annual plan. These plans are public documents. They contain information about many organizations with which you might want to establish contact.

TITLE II: COMPREHENSIVE EMPLOYMENT AND TRAINING SERVICES

Title II addresses employment and training opportunities that extend beyond local prime sponsor control. Its focus is on training economically disadvantaged persons, upgrading and retraining those who traditionally have been limited to low-paying, dead-end jobs. Title II has four parts:

Part A—Financial Assistance Provisions
Part B—Services for the Economically Disadvantaged
Part C—Upgrading and Retraining
Part D—Transitional Employment Opportunities for the Economically Disadvantaged.

Parts A, B and C are of greatest importance to local vocational educators. The regulations describing the purpose of special grants to governors point out that these programs are to meet needs which do not fall within the jurisdiction of a single prime sponsor. The purposes of this money are to provide supplemental vocational education and establish linkages between prime sponsors and educational agencies and institutions; to conduct governors' coordination and special services within the state, and to provide support to state employment and training councils. (See Section 202 b to e of the amendments and Section 677.31 to 677.42 of the regulations.)

Those methods designated for meeting these needs are:

Supplemental vocational education assistance—Six percent of Title II, Parts A, B and C allocation, channeled through the State Board of Vocational Education or its equivalent. (See Sections 202 b and 204 of the act.)

Governor's coordination and special services—Four percent of Title II, Parts A, B and C allocation. (See Section 105 and 202 e of the act.)

Coordination and linkage with educational agencies—One percent of Title II allocation. (See Section 202 d of the act.)

State Employment and Training Council—One percent of Title II, Parts A, B and C allocation. (See Sections 110 and 202 c of the act.)

Voc Ed Activities Described

A Special Grant Annual Plan from the governor is required to document vocational education services. Such a plan specifies the number of participants to be served by vocational education projects and gives information about state coordination and special services and educational linkages. An accompanying Special Grant Program Narrative must describe the arrangements for conducting the vocational education programs and activities through the State Board for Vocational Education.

A quick understanding of the current status of coordinated activities in your area can be acquired by obtaining a copy of this plan, which is

available to the public, or simply by contacting your local prime sponsor. (See Part III.)

Each prime sponsor is required to develop a nonfinancial agreement with the State Board for Vocational Education for the expenditure of governor's supplemental vocational education assistance funds by the state board in the prime sponsor's jurisdiction. You can determine how this allocation actually is assigned to your area by contacting either the prime sponsor or appropriate vocational education board.

CETA's fiscal year runs from October 1 to September 30. Preliminary planning occurs in late winter and formal approval of plans in the summer. Allocations for prime sponsors are published in the *Federal Register*.

The governor's four percent funds earmarked for coordination and special services are available for a wide range of institutional and informational activities. Improved use of available labor market data for coordinated planning of economic development, human resources development and education are stressed.

Fostering SOICC Activities

Fostering the activities of your state occupational information coordinating committee (SOICC) is also singled out as an appropriate activity under this part. In general, you should view these activities from a consumer's perspective. Ask "What can this source of funding do for me?" Ask how these funds have been used in the past and how priorities for their future use are set.

The governor's one percent linkage funds are available for direct encouragement of coordination between prime sponsors and local education agencies (LEAs). These funds can support the cost of curriculum materials and technical assistance. (See Section 677.38 of the CETA regulations.)

One activity that might be of special importance is the development of open-entry/open-exit courses and academic credit for CETA training. In short, funds are to be made available through the governor's auspices to encourage the formation and expand the size of jointly delivered programs.

At least 85 percent of the funds made available through the governor's supplemental vocational education assistance program must be used for providing vocational education services to prime sponsor participants.

You should note that Title II, Part B, funding for the types of employment and training described earlier is available only for persons who are economically disadvantaged and unemployed, underemployed or in school.

TITLE II, PART C: UPGRADING AND RETRAINING funding can be used to upgrade the skills of a person who is working in a position that does not fully utilize his or her skill potential. That person must have worked at least the prior six months with the same employer in either an entry-level, unskilled or semi-skilled position or a position with little or no advancement opportunity in a normal promotional line.

This section gives priority consideration to persons with potential for upward mobility who have held entry-level positions for the longest time. For funding or retraining activities, a person must have received bona fide

notice of an impending layoff within the last six months and qualify by having had little opportunity to be re-employed in the same or an equivalent occupation or skill level within the labor market area.

You should determine what priority the prime sponsor in your area has given to Part C activities, which can absorb up to 6.5 percent of the total Part A, B and C allocation. Then explore the opportunities which do or could exist for direct involvement in these activities, remembering that related instructional opportunities can accompany on-the-job training.

TITLE II, PART D: TRANSITIONAL EMPLOYMENT FOR ECONOMICALLY DISADVANTAGED provides unemployed persons who meet additional eligibility criteria with entry-level public sector transitional employment. Ten percent of the funds are dedicated to training in FY 1979, increasing to 22 percent earmarked for training by FY 1982. You should explore this training provision to see how it affects your related instructional offerings.

Each part of Title II offers an opportunity for you to become involved in CETA programming. Your success will depend largely on the initiative you take in forging new institutional alliances.

TITLE III: SPECIAL FEDERAL RESPONSIBILITIES

An array of programs and services is authorized in Title III to develop the employability skills of persons with particularly severe disadvantages. Eligible client groups include, but are not limited to, offenders, persons with limited English-speaking abilities, handicapped persons, women, single parents, displaced homemakers, youth, older workers, persons who lack educational credentials and those receiving public assistance.

Programs under this title generally are administered from the national level by public or private agencies that can provide services to more than one state. These programs must foster new or improved ties between prime sponsors and community-based organizations. Many prime sponsors will be unfamiliar with funding possibilities for this title, so you may have to contact the Department of Labor's Office of National Programs. (See Appendix for address.)

Programs for displaced homemakers are to receive not more than two percent of the Title III allocation. Activities authorized include training and supportive services, such as job training, job counseling, job search and placement services.

Employment and training programs for Native Americans, migrant and seasonal farmworkers and the handicapped also are covered under Title III, Part A.

PART B OF TITLE III provides national funding for research, training and evaluation. Under these auspices and through Title IV programming, many vocational education institutions have become involved in short-term demonstration activities. Opportunities for such participation usually involve substantial preparation and collaboration with a research organiza-

tion, although on occasion a research contractor will seek out a demonstration institution.

TITLE III, SECTION 318: EMPLOYMENT AND TRAINING ACTIVITIES TO STIMULATE LOCAL PRIVATE ECONOMIC DEVELOPMENT relates to collaborative strategies for promoting private investment in the community. Determination of the skills to be provided in training and retraining in such instances obviously should involve local vocational educators.

TITLE IV: YOUTH PROGRAMS

This title offers a wide range of employment and training programs to give eligible youth alternative ways to improve their future employability.

Congressional action in 1980 to reauthorize Title IV, Part A: Youth Employment Demonstration Programs will affect your relationships with prime sponsors. The proposed youth employment act, building on experience with Title IV, would combine education, training, work experience and related services. The new youth program would consolidate local programs and it is expected to increase local decision-making. It also would provide more money to distressed areas.

There are three parts to Title IV—Youth Employment Demonstration Programs (YEDP), the Job Corps and the Summer Youth Employment Program. YEDP includes Youth Incentive Entitlement Pilot Projects (YIEPP), Youth Community Conservation and Improvement Projects (YCCIP) and Youth Employment and Training Programs (YETP).

Youth aged 16 to 19 whose family income is at or below the poverty level have been the only ones eligible for enrollment in Youth Incentive Entitlement Pilot Projects. YIEPP demonstrations were set up at 17 sites to guarantee full-time summer employment and part-time jobs during the school year for eligible youth.

Only economically disadvantaged youth aged 16 to 21 who are either unemployed, underemployed or in school are eligible for Youth Community Conservation and Improvement Projects, the Youth Employment and Training Program, Job Corps and Summer Youth Employment Program participation.

Part A, Subpart 3: Youth Employment and Training Programs

YETP is the focal point of CETA-vocational education cooperation at the local level. Seventy percent of Part A funds are allocated for this subpart. The legislation states that it is the purpose of this subpart to establish programs to make a significant long-term impact on the structural unemployment problems of youth by supplementing but not replacing programs and activities available under Title II of the act.

Sixteen categories of services that may be funded under this part are listed. They include outreach, assessment, orientation, counseling, development of information, literacy training, attainment of equivalency certificates, job-sampling, institutional and on-the-job training, job devel-

opment, job restructuring and placement assistance.

Seventy-five percent of the funds available for YETP go directly to prime sponsors on a formula basis. From this amount, not less than 22 percent must be used for in-school youth programs. Eligible participants must be enrolled in a full-time program leading to a secondary level diploma, a junior or community college degree or a technical/trade school certificate. State and local maintenance of funding effort provisions are required of all agency recipients of CETA funds under this subpart.

A prime sponsor that receives YETP funds must establish a youth council, including representation of the local vocational education advisory council. Work experience programs for in-school youth funded under YETP require an agreement between the prime sponsor and a local education agency or agencies. The agreement assures the substance of the program and the review of the agreement by the youth council.

Finally, the act states that suitable arrangements should be made to provide academic credit consistent with applicable state law. This credit would be granted for competencies derived from work experience secured through YETP auspices.

Title IV, Part A programs offer both an opportunity and a challenge. There now are many organizations which make it their business to offer training services to economically disadvantaged youth. Each institution must make its case to the appropriate recipient of CETA funds. This challenge will become more apparent in the next few years as accountability for employment outcomes and earnings improvement becomes more stringent.

TITLE IV, PART B: JOB CORPS offers opportunities to establish a Job Corps center or to participate in the activities of existing centers. Section 462 (B) of the act provides for the development of experimental projects to determine whether upgraded vocational education schools could eliminate or substantially reduce the school dropout problem and to demonstrate how communities could make maximum use of existing educational and training facilities.

TITLE IV, PART C: SUMMER YOUTH EMPLOYMENT PROGRAM offers continuing opportunities for participation in short-term training and related instruction activities in your local area.

TITLE V: NATIONAL COMMISSION FOR EMPLOYMENT POLICY

This commission, formerly the National Commission for Manpower Policy, is the CETA counterpart of the National Advisory Council on Vocational Education. A representative of the National Advisory Council on Vocational Education is a mandated member of the commission.

One of the 10 functions of the commission is to identify, with consultation from the National Advisory Council on Vocational Education, the employment and training and vocational education needs of the nation. The commission is directed to assess the extent to which employment and train-

ing, vocational education, vocational rehabilitation and other programs assisted under this and related acts represent a consistent, integrated and coordinated approach to meeting such needs.

Again, the statement of purpose is clear. CETA and vocational education should coordinate and integrate the provision of services.

TITLE VI: COUNTERCYCLICAL PUBLIC SERVICE EMPLOYMENT PROGRAM

The thrust of this title's allocation is support for persons who are temporarily out of work due to economic conditions causing a reduction in job market opportunities. There is a stipulation, however, that no less than five percent of the title's allocation must be devoted to training and employability counseling and services to persons so employed. In light of this mandate, it is worth exploring the prime sponsor's intentions regarding Title VI.

TITLE VII: PRIVATE SECTOR OPPORTUNITIES FOR THE ECONOMICALLY DISADVANTAGED

This is a demonstration title, similar in this respect to Title IV, Part A. The intent is to supplement employment and training activities of the business community in all titles of the act. Each prime sponsor is required by the CETA regulations to establish a private industry council (PIC) to ". . . analyze private sector job opportunities, including estimates by occupation, industry, and location."

A PIC is directed ". . . to refine employment and training programming so that it becomes increasingly reponsive to private sector labor needs." Developing and operating local private sector employment and training programs also are PIC mandates. This can represent an opportunity or competition for local vocational educators, depending on the role they play on the PIC.

The diversity of local circumstances is recognized, so varied forms of PIC composition and activity are permitted. Among the required member of the PIC are educational agencies and institutions of demonstrated effectiveness. (See Appendix for publications of the National Commission for Employment Policy.)

POSSIBLE LINKAGE ACTIVITIES

Among the specific activities cited in the CETA regulations are:

- Coordinating programs of jobs and training and education, enabling individuals to work for a private employer while attending an education or training program
- Conducting innovative cooperative education programs for youth in secondary and postsecondary schools designed to coordinate educational programs with work in the private sector.

These activities, then, are the possibilities under CETA:

Classroom training: Instruction in technical skills and information and to upgrade basic skills.

On-the-job training (OJT): Training in the public or private sector for persons in the work force. OJT may be coupled with other CETA activities, giving vocational educators an opportunity to develop related instructional programs.

Public service employment (PSE): Subsidized employment with public agencies and private nonprofit employers that provide public services.

Work experience (WE): A short-term or part-time assignment with a public or private nonprofit organization intended to enhance the employment potential of individuals through the development of good work habits and basic work skills.

Services: Direct services to applicants, including employment and training supportive services such as transportation or financial counseling, and services for 30 days following termination from another CETA activity. The latter includes employment and training and supportive services for participants who have taken unsubsidized jobs to enable them to retain employment.

Other activities: This catch-all category permits activities such as the removal of artificial barriers to employment, job restructuring, revision or establishment of merit systems and affirmative action plans.

LINKAGES UNDER CETA AND VOCATIONAL EDUCATION LEGISLATION

CETA	Vocational Education
Purpose	
Provide job training and employment opportunities for economically disadvantaged, unemployed or underemployed persons.	Assist states in delivering vocational education and manpower training for all citizens. Also, to provide parttime employment for youth who need the earnings from such employment to continue vocational training on a fulltime basis.
Planning	
Prime sponsors must establish: 1) a planning council (local); 2) a state employment and training council (appointed by Governor); 3) an annual plan for Secretary of Labor.	States must establish: 1) local advisory councils (for LEAs receiving federal funds); 2) a state advisory council; 3) annual and 5-year plans for Commissioner of Education.

LINKAGES—Continued

State Level Coordination of Education and Employment Training Programs	
The Secretary of Labor makes grants to Governors to provide financial assistance, through state vocational education boards, for needed vocational education services in areas served by the prime sponsors. Set aside monies are provided for this purpose.	State vocational education boards must consult with prime sponsors and the state agencies and councils identified in the 5-year plan for vocational education before receiving CETA grants.
Research	
Provision to work cooperatively with other agencies and organizations to formulate employment and training policy, more effective worker development and expanded research in the area of unemployment, education and training.	Provision to establish cooperative arrangements between public education and manpower agencies, designed to correlate vocational education opportunities with current and projected labor market needs.
Demonstration projects to be coordinated with community vocational resource centers to promote expanded guidance and counseling services for individuals in economically depressed areas.	Establishment of vocational resource centers to meet the special needs of specific clientele that include individuals from economically depressed areas.
National Occupational Information Coordinating Committee	
The Secretary of Labor will establish a nationwide computerized job bank and matching program, as well as a comprehensive system of labor market information on a national, state and local basis.	Law mandates the establishment of both national and state occupational committees.
Responsibility to give special attention to the labor market needs of youth.	Must use program data to improve coordination between CETA and vocational education programs.
Youth Council	
Each youth council is responsible for making recommendations to the planning council with respect to planning and review of activities.	The youth council must have representation from the local educational agency, local vocational education advisory council and others.

Source: *Manpower Insider, VocEd,* Journal of the American Vocational Association, *Vol. 55, No. 1,* 42a.

Many of the programs being provided at vocational education institutions can become part of training efforts by CETA prime sponsors. *(Photo courtesy of Elizabeth Oberdorf.)*

Part III
ESTABLISHING COOPERATIVE EFFORTS

With the many opportunities that exist for CETA-vocational education coordination, it is worth exploring the strategies that can be used to overcome philosophical and structural differences in the two systems. Of course, there is likely to be resistance to the change brought about by any new cooperative venture. But there also are benefits, financial and otherwise, for both partners when vocational educators take some initial steps to set up linkages with CETA.

RESISTANCE TO CHANGE

Most organizations encounter problems with implementing change. A change is perceived as upsetting the status quo by altering existing roles, relationships, influence, power and resources. Various stakeholders in the vocational education system *do* stand to lose because of change brought about by increased coordination and cooperation with the CETA system. We must understand what potentially is lost in comparison to what might be gained before developing a strategy for promoting positive changes.

From the state department of education's perspective, there is the potential for losing influence and power over local education agencies. This potential exists as long as the state agency fails to play an integral part in establishing and promoting cooperative ties with CETA prime sponsors. In an absolute sense, channeling resources directly to local school districts has a direct effect upon the relative importance of the state department's resources. It diminishes the reliance of local vocational programs on state funding.

Typically, state divisions of vocational education plan and oversee the education programs in the state in reponse to social needs that are dictated by a state constitution, legislature, governor and the public at large. State education policy usually emphasizes the allocation of vocational education resources to a general population. In contrast, the federal vocational education objectives and funds are targeted to special-needs populations such as the disadvantaged and handicapped.

Systems Not Uniform

The state-local system of vocational education is not, however, uniform from one state to another. Some states pursue a "hands-off" policy toward local vocational education programs, while others exercise more centralized control. There are similar variations in the resources provided and the target groups served. Some states stress the delivery of services to secondary students, while others stress postsecondary programs (Project Baseline, 1976, p. 6-8).

Despite these differences, the state-local system is comparatively more unified within a given state than the federal-state system. The motivation for unity comes directly from the symbiotic relationship between the state and local levels. Local programs are dependent upon the state for funding. In turn, the state, which has resources, needs viable local programs on which to spend its resources. Consequently, it is dependent for its continued

existence upon local programs just as those programs are dependent on the state.

What does the presence of a dual system of vocational education mean for efforts to promote vocational education-CETA cooperation? Clearly, the state level surfaces as the link within vocational education between the federal and local level. In essence, it is the broker for vocational education services within the state.

To ignore the importance of this role and to bypass this level in efforts aimed at coordination would be self-defeating. The involvement of the state level becomes even more critical in instances in which the services of several school districts must be coordinated within a single prime sponsor's jurisdiction.

There are several key functions that the state level should be expected to provide. State education agencies can:

- Establish organizational linkages with each prime sponsor in the state
- Promote the establishment of consortia among local school districts to deliver services
- Provide incentive money to encourage local education agency-CETA coordination
- Give technical assistance to local agencies in the design and operation of programs to serve CETA clients.

Local Level Resistance

At the local level, cooperation with CETA brings the school in closer contact with potential employers in the community. It can make schools more attuned to the employment-related problems that many people face. But increased cooperation also means that local administrators must share some of their institutional control with those outside the vocational education system.

Traditionally, educators have resisted efforts that would lessen their administration of those aspects of education they have formerly controlled. For example, a study conducted by the National Association of State Boards of Education found that educators questioned the certification of Title IV, Part C: Work Experience, since the education occurs at the work site and not at school (National Association of State Boards of Education, 1978, p. 35).

Cooperation with CETA is apt to increase the relative importance of those areas within vocational education where CETA funds are authorized to be channeled. Guidance and counseling, cooperative education programs and those subject areas providing training in occupations with the greatest employment opportunities stand to gain the most.

Those apt to gain less are the subject areas of agriculture and home economics because they typically provide training that is less transferable to employment opportunities in most labor markets. Resistance to cooperation should be anticipated from such nonparticipant subject areas.

Obviously, a strategy devised to demonstrate how diverse subject matter areas might contribute to serving CETA clients needs to be explored.

Cooperation and linkage are unlikely to occur unless the subject area parochialism that has plagued vocational education for so long is dealt with directly.

ADEQUACY OF INCENTIVES

It is too early to assess the cumulative effect of the various incentives for CETA-vocational education cooperation. Certainly the vocational education community now is more aware of CETA programs. There may be some evidence suggesting that the Department of Labor has "pushed too hard" for cooperation between CETA prime sponsors and local education agencies ("A Review of Prime Sponsor Experience," 1979, p. 5). Whether the effects are ones that promote balanced coordination between the two systems or place one system in a subordinate role remains to be seen.

Also to be considered is the introduction of CETA as a funding source into the established arrangements between state and local vocational educators. In some school systems, the CETA prime sponsor will be the major funding source and will become the organization from which education institutions take their cues for action.

There is increased recognition of the need for federal leadership in bringing about CETA-voc ed collaboration. When Congress established the Department of Education in October 1979 it authorized the Federal Interagency Committee on Education. The committee will conduct studies and make recommendations on coordination of federal program policies and administration practices, the progress of federal voc ed training programs and the coordination of all federally funded vocational education and training programs.

Even conservative estimates of the amounts of CETA money going for vocational education programs show that this funding is significant. According to the CETA coordinating unit in the former U.S. Office of Education, more than $100 million went to states in FY 78 through the six percent supplemental grants to each governor under Section 204. Millions more are allotted under other CETA titles.

In addition, funds are directed to demonstration projects sponsored by Youthwork, Inc., which are designed to test various combinations of schooling, counseling and job counseling. (See Appendix.) There also are direct transfers of CETA funds from the Department of Labor and Education and other expenditures in education not classified under any of the previously mentioned categories. For example, the four percent special grant funds available to each state may be assigned as direct grants to the education systems.

The funding for CETA programs for FY 80 and 81 will be affected by Congressional budget-balancing measures that reflect concern for rising inflation rates and fears of recession. Whatever the final appropriations, however, it is clear that the Department of Labor's contribution to vocational education through CETA is important.

Questions to Consider

Whether the flow of funds from CETA to vocational education is to bring about increased long-term coordination and cooperation is uncertain at this time. The following questions need to be answered about the factors that will enhance long-term coordination and cooperation between the two systems:

1. To what extent are vocational education funds being used to promote coordination and cooperation? Or to what extent is the vocational education system providing for linkages with CETA?
2. What effect will the apparent lack of reciprocity (or great disparity) in the flow of funds from the vocational education system to CETA have on the prospects for improved coordination and cooperation?
3. How effective are federal financial incentives in promoting coordination and cooperation at the local level? This consideration is significant in light of the decidedly local decision-making character of CETA and the absence of a unified system of vocational education.
4. Are the financial incentives for coordination and cooperation targeted and administered through the most effective channels?

We must keep in mind, though, that the guiding factor in promoting coordination and cooperation must be the effect that such efforts might have on students. This is particularly true when we are assessing the adequacy of incentives.

It is apparent as we look at the CETA provisions that there are some collaborative opportunities that require little change in current administrative practices of local vocational educators. Other cooperative ventures involve greater degrees of adaptation. This need for adaptation explains the need to focus so heavily on incentives for organizational change. Opportunity alone may not be enough to achieve your desired role.

Four Problems to Solve

There are four problems likely to be encountered by a local vocational educator who sets out to explore cooperative possibilities with a CETA prime sponsor: (1) differences in philosophy; (2) inconsistencies in organizational structures; (3) attempts to maintain the status quo and (4) the question of incentives. Since these problems are largely interdependent, efforts to solve one may help provide a solution to others.

It's important to keep in mind when dealing with philosophical differences that philosophy is a product of the times. Presumably, the prospect of declining enrollments and a general taxpayer revolt could alter the philosophical and administrative themes in a public institution.

Thus, it is likely that philosophies about education and training will change. There is evidence that vocational education policy is beginning to stress services to the disadvantaged. Observers of CETA also have noted an increased emphasis in training and a de-emphasis on the employment goal. It appears that the philosophies of the systems may be converging to some degree. Be prepared to take advantage of the trend.

Similarly, the structure of organizations does not develop in a vacuum. We can expect the presence of many local organizations competing for at least partially overlapping client groups to create a different administrative style and structure than existed in the days of territorial autonomy.

Attempts to maintain existing personal and organizational relationships also are a product of the environment in which events unfold. Fear of the unknown can be expected to diminish the enthusiasm of those threatened by the prospects of any new cooperative ventures.

It is not enough to say: "But it's for the good of the youth and adults who will benefit from our involvement." Potential adversaries should be identified beforehand and steps taken to neutralize their resistance. If top-level local educational administrators are concerned about how service to the economically disadvantaged will affect the image of the school system, this fact can't be ignored. It must be dealt with. Top school officials must understand that there are compensations for this perceived "cost" of cooperation.

Incentives also are a product of the current political and economic environment. The adequacy of financial incentives is an issue that rests with policy makers at the federal level. But vocational educators can influence policy by making their views known to their congressional representatives, by supporting the work of professional organizations and by maintaining direct contact with local prime sponsors.

A PLAN OF ACTION

1. *Communicate with your local prime sponsor.* Your prime sponsor will be either a local, state, county, consortium or balance of state operation, which you can determine through your local chief elected official. Identify the prime sponsor's CETA planner, manpower planner, regional planner or youth representative to arrange an information-sharing meeting.

Be prepared to tell about the services your educational agency or institution offers and to find out as much as you can about the concerns and interests of the prime sponsor. You'll want to ask about the funding cycle, currently funded activities and future possibilities for participation.

These are some of the questions you may wish to have answered:

- What groups are being served by the prime sponsor?
- What role is being played by the planning council, the youth council and the private industry council?
- What is the budgeting cycle of the prime sponsor's governing body?

You'll want to put your name on the prime sponsor's mailing list to review the Comprehensive Employment and Training Plan and to receive information about program development and funding. You'll want to maintain contact throughout the year to continue cooperative efforts.

Mapping the local employment and training terrain is much easier if you obtain copies of the prime sponsor's current annual plan and those from previous years. Reading these will give you needed insights about the agen-

cies that have delivered services previously and about the organizational network that is already in place.

Notify the prime sponsor in writing if you wish to have your institution included on the inventory of potential service deliverers. Describe the types of services and activities you can provide, documenting the numbers and types of people you have served in the past.

With a balance of state prime sponsor, your contact will be the regional manpower advisory committee appointed by the regional development commissions in each of eight planning areas. A source of information also is the state employment and training council appointed by the governor. This body coordinates efforts with other state agencies, including the state advisory council on vocational education.

Remember that rapid change has occurred in legislation and regulations and will continue to occur with CETA. Don't shut off innovative ideas and plans for collaboration just because you don't find evidence of a prior nurturing relationship. Pay particular attention to the presence and role of community-based organizations. They receive special consideration as recipients of funds.

Vocational educators are mandated by law to play a role in the CETA planning process. Let local elected officials know your willingness to be represented on the prime sponsor planning council and other appropriate bodies. Keep yourself informed about the decisions and activities of these groups.

2. *Take stock in-house.* Who is likely to support external involvement? Will your local school administration be supportive? What about other vocational educators, such as teachers and counselors? Who is expected to be an adversary? It is necessary to determine the reasons for the reluctance to cooperate.

Having made a list of supporters and adversaries, you can judge which group is likely to support proposed cooperative ventures. You may want to canvass your supporters for their opinions about project success.

If it appears that the adversaries can and will block your desired path of action, explore possible incentives that might be offered to secure their support. Think strategically. You may need to provide information to adversaries. Perhaps giving them the opportunity to participate in the project might solve your problem.

If your efforts fail to bring adversaries around to your way of thinking, don't be overly concerned. Remember, any organizational change is bound to be threatening to some people. Remember that at this juncture in the history of vocational education there is a greater need for people with new and innovative ideas than for protectors of the status quo.

3. *Think ahead.* Prepare scenarios of what the education and employment and training systems may look like next year and five years from now. Ask such questions as these:

- What changes are we apt to see in federal vocational education policies and what effect will these changes have on me as an educator?

- What changes are likely to occur at the state and local education level? Are financial resources apt to be more scarce?
- Can we expect to see more targeting of federal vocational education dollars to the disadvantaged and handicapped populations?
- What would be the effect on local and state vocational education programs if there no longer were federal dollars to support vocational education?
- What if the federal investment in employment and training were limited to CETA?
- Given the prospect of declining school enrollments and the aging of the post-war "baby boom," what changes must occur in the delivery of vocational education services?
- Are the problems of unemployment, underemployment and poverty to be viewed as temporary or longer-range, more permanent national problems?
- Given the performance of CETA and vocational education within the past five years, which system seems to be faring best? Why? What circumstances would alter this outcome in the next five years?
- What are the reasons for two seemingly duplicative systems of education and employment and training programs in this nation? How long is this duplication bound to exist? Is convergence of the systems desirable?

Obviously, we have asked you to consider some weighty questions. The reason is simple. Today there is an opportunity for you to help mold tomorrow's institutions. Tomorrow, those who are merely onlookers today will be placed in a largely passive role, reacting to rather than directing the course of events.

4. *Keep your ear to the ground.* There is an extraordinary amount of innovative activity going on as progressive vocational educators and prime sponsors forge new ties for collaboration at the local level. You should make an effort to follow closely what is happening throughout the country, so that you can be in a position to assess its relevance for, and adaptability to, your own situation.

Be sure to explore opportunities with which your prime sponsor may not be familiar. The Office of National Programs in the Department of Labor's Employment and Training Administration can help. (See Appendix.) For example, direct funding is available under Title III for programs serving employment-related needs of those with particularly severe disadvantages.

Coordination is Increasing

Several recent studies of CETA-voc ed coordination have shown that these linkages are on the increase. Attention is being directed toward the "success stories," as well as to the problems of the collaboration.

The U.S. Conference of Mayors, in a status report on coordination efforts, pointed to the growing involvement of vocational education personnel in the CETA planning process. Where successful programs were in operation, the study found relationships based on mutual respect and open

working channels of communication (United States Conference of Mayors, 1979).

Relationships between local schools and CETA have been encouraged by the Youth Employment and Demonstration Projects, says a report from the National Council on Employment and Youth Policy. However, relationships are basic and their future is uncertain, with most collaboration found in the planning or negotiating stages rather than in day-to-day operations (Wurzburg, 1980).

Cooperation isn't in the cards for everybody. However, experience shows that failure to persist long enough to succeed frequently can be traced to a simple absence of accurate information about the various choices for participation.

The four principles for action introduced here are reasonably easy to carry out. They should provide a reliable signal about the prospects for local cooperation.

The rest is up to you. You have the staff and facilities, experience with the establishment of skill training standards, a tradition of employability assessment and years of involvement in cooperative education and related instruction. Your enthusiasm and initiative are essential to the future of CETA-vocational education cooperation and success.

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National Association of State Boards of Education. *Education Policy and the Youth Employment and Demonstration Project Act of 1977.* Washington, D.C.: Author, 1978.

Project Baseline. *Learning and Living Across the Nation* (Vol. 5). Flagstaff, Ariz.: Northern Arizona University, 1976.

A Review of Prime Sponsor Experience in Implementing the Youth Employment and Demonstration Projects Act. *Manpower and Vocational Education Weekly,* April 26, 1976 *9*(17), 5.

United States Conference of Mayors. *CETA Vocational Education Coordination/A Status Report.* Washington, D.C.: Author, 1979.

Wurzburg, G. *Youth and the Local Employment Agenda/An Analysis of Prime Sponsor Experience Implementing the Youth Employment and Deomonstration Projects Act.* Washington, D.C.: National Council on Employment Policy, 1980.

APPENDIX
SOURCES OF INFORMATION

The local prime sponsor in your area should be your major source of current information about CETA operations. You also should maintain direct contact with persons associated with the state employment and training council and your own prime sponsor's planning council, youth council and private industry council (PIC).

Your state department of education may be a very good source of information and should be involved whenever possible. Regional offices of the Employment and Training Administration (ETA) of the Department of Labor (DOL) also have facts on CETA activities.

At the national level, contact appropriate units within:

Employment and Training Administration
U.S. Department of Labor
601 D Street, N.W., Washington, D.C. 20213

The units are:

- Office of Comprehensive Employment Development
  (202) 376-6254
- Office of National Programs
  (202) 376-6093
- Office of Youth Programs
  (202) 376-2646

The Education Department maintains a CETA coordinating unit within the Office of Vocational and Adult Education. The coordinating unit provides information about prime sponsors, DOL and state level contacts, available funds and provisions of legislation. Contact:

CETA Coordinating Unit
Office of Vocational and Adult Education
Education Department
7th and D Street, S.W. (ROB-3)
Washington, D.C. 20202
(202) 245-9730

The ETA/DOL Office of Youth Programs, in cooperation with several private foundations and other government agencies, has involved four private nonprofit corporations in administering the CETA Title IV demonstration projects. They are:

- Corporation for Public/Private Ventures
  1726 Cherry Street, Philadelphia, Pa. 19103
  (215) 564-4815
- Manpower Demonstration Research Corporation
  3 Park Avenue, New York, N.Y. 10016
  (212) 481-0830
- Youthwork, Inc.
  Suite 705
  805 15th Street, N.W., Washington, D.C. 20005
  (202) 347-2900

- Corporation for Youth Enterprises
  1320 19th Street, N.W., Washington, D.C. 20036
  (202) 466-3505

Publications that will be useful for those involved in coordination efforts include:

The Business Sector Role in Employment Policy, Special Report No. 31, and *An Enlarged Role for the Private Sector in Federal Employment and Training Programs,* December 1978
National Commission for Employment Policy
Suite 300, 1552 K Street, N.W.
Washington, D.C. 20005

Catalyst: Helping Community Groups Get Involved in CETA (monthly newsletter, free)
Center for Community Change
1000 Wisconsin Avenue, N.W.
Washington, D.C. 20007

CETA Vocational Education Coordination/A Status Report, November 1979
United States Conference of Mayors
Distributed to state directors of vocational education, state advisory councils on voc ed, state occupational information coordinating committees and to prime sponsors

Completing the Youth Agenda: A Plan for Knowledge Development, Dissemination and Application for Fiscal 1980, October 1979
Department of Labor
Employment and Training Administration
Office of Youth Programs

Comprehensive Employment and Training Act (CETA) Amendments of 1978 (P.L. 95-524) Comprehensive Employment and Training Act Regulations for Titles I, II, VI, and VII
Free from the Department of Labor

Guide to Serving Youth Together
Handbook based on a study of over 100 programs linking CETA Title IV programs to vocational education ($10.00). Also available at varying costs are three state-of-the-art volumes and a 20-minute filmstrip.
CONSERVA, Inc.
401 Oberlin Road, Suite 112
Raleigh, N.C. 27605
(919) 832-7717

Information Series No. 151. "The Coordination of Vocational Education Programs with CETA" by David W. Stevens, 1979
The National Center for Research in Vocational Education
Columbus, Ohio

Partners: CETA, Education, Youth, 1979
Division of Special Services
Youth Employment Education Unit
Minnesota Department of Education
St. Paul, Minn. 55101

Youth and the Local Employment Agenda/An Analysis of Prime Sponsor Experience Implementing the Youth Employment and Demonstration Projects Act by Gregory Wurzburg, January 1980
National Council on Employment Policy
Youth Evaluation Project
2000 K Street, N.W., Suite 454
(202) 833-2532

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